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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION**

11 In re

12 LILIAN GRACE PICKETT ABRENICA,
13 Debtor(s).

Case No. 10-72883

Chapter 13

**JPMORGAN CHASE BANK'S REQUEST
FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF
RIGHTS**

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16 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL
INTERESTED PARTIES

17 PLEASE TAKE NOTICE that the firm of PITE DUNCAN LLP, attorneys for
18 JPMorgan Chase Bank, National Association hereby requests special notice of all events relevant to
19 the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the
20 above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy
21 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests
22 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
23 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other
24 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the
25 above-referenced bankruptcy court.

26 PITE DUNCAN LLP, requests that for all notice purposes and for inclusion in the
27 Master Mailing List in this case, the following address be used:
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2 Casper J. Rankin
3 PITE DUNCAN LLP
4 4375 Jutland Drive, Suite 200
5 P.O. Box 17933
6 San Diego, CA 92177-0933

7 Neither this Request for Special Notice nor any subsequent appearance, pleading,
8 claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
9 waiver of the within party's:

10 a. Right to have any and all final orders in any and all non-core matters entered
11 only after de novo review by a United States District Court Judge;

12 b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the
13 instant proceeding by Fed. R. Bankr. P. 7004, notwithstanding Pite Duncan, LLP's participation in
14 the instant proceeding. This Request for Special Notice shall not operate as a confession and/or
15 concession of jurisdiction. Moreover, the within party does not authorize Pite Duncan, LLP, either
16 expressly or impliedly through Pite Duncan, LLP's participation in the instant proceeding, to act as
17 its agent for purposes of service under Fed. R. Bankr. P. 7004;

18 c. Right to trial by jury in any proceeding as to any and all matters so triable
19 herein, whether or not the same be designated legal or private rights, or in any case, controversy or
20 proceeding related hereto, notwithstanding the designation or not of such matters as "core
21 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
22 statute or the United States Constitution;

23 d. Right to have the reference of this matter withdrawn by the United States
24 District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

25 e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters
26 to which this party is entitled under any agreements at law or in equity or under the United States
27 Constitution.

28 Dated: December 13, 2010

PITE DUNCAN LLP

/s/ Casper J. Rankin
Attorneys for JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION

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I served the attached REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS
AND RESERVATION OF RIGHTS by placing a true copy thereof in an envelope addressed to:

Lilian Grace Pickett Abrenica
4797 Fair Avenue
Oakland, CA 94619

Which envelope was then sealed and postage fully prepaid thereon, and thereafter on December 13, 2010 deposited in the United States Mail at San Diego, California. There is regular delivery service between the place of mailing and the place so addressed by the United States Mail.

Dated: December 13, 2010

/s/ Michael Martinez
MICHAEL MARTINEZ